

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (BRL) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. METRO MOTOR IMPORTS, INC., Defendant.	Adv. Pro. No. 10-04499 (BRL)

STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendant Metro Motor Imports, Inc. may move, answer or otherwise respond to the Complaint is extended up to and including August 12, 2011.

The purpose of this stipulated extension is to provide additional time for Defendant to answer, move against, or otherwise respond to the Complaint. This is the first such extension. Nothing in this stipulation is a waiver of the Defendant's right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Undersigned counsel for Defendant Metro Motor Imports, Inc.: (i) expressly represent that they have the authority to, and do hereby, accept service of the Summons and Complaint in the above-captioned adversary proceeding on behalf of Defendant, and (ii) hereby waive any defenses based on insufficiency of process or insufficiency of service of process of the Summons and Complaint on behalf of Defendant.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original.

Dated: June 10, 2011

Of Counsel:

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*Attorney for Defendant Metro Motor
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SO ORDERED

Dated: June 13, 2011
New York, New York

/s/Burton R. Lifland
HON. BURTON R. LIFLAND
UNITED STATES BANKRUPTCY JUDGE